

EXHIBIT 3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BILLY GENE NORRIS,

Plaintiff,

-vs-

Case No. 19-cv-10782

Hon. Terrence G. Berg

Mag. Judge Stephanie Dawkins Davis

CHIEF JADIE R. SETTLES;
OFFICER A. HATHORN;
OFFICER CHRISTOPHER REYNA;
OFFICER JASON ORME;
DETECTIVE C. HARKINS;
CITY OF ROMULUS, a political
subdivision of the State
of Michigan,

Defendants.

/

The Deposition of BILLY GENE NORRIS, II, taken for purposes of discovery in the above-entitled matter before Susan L. Marek, CSR-2692, Notary Public and Certified Shorthand Reporter in and for the County of Wayne (Acting in the County of Oakland), State of Michigan, at 26700 Lahser Road, Suite 400, Southfield, Michigan, on Monday, August 26, 2019, commencing at 8:40 a.m.

APPEARANCES:

MARTIN E. RADNER (P79894)
Excolo Law, PLLC
26700 Lahser Road, Suite 400
Southfield, Michigan 48033
(248) 291-9712

Appearing on behalf of Plaintiff.

AUDREY J. FORBUSH (P41744)
Plunkett Cooney
Plaza One Financial Center
111 East Court Street, Suite 1B
Flint, Michigan 48502
(810) 342-7014

Appearing on behalf of Defendants.

ALSO PRESENT: Captain Derran Shelby
Officer Christopher Reyna

I N D E X

WITNESS:

PAGE

BILLY GENE NORRIS, II

Examination

Ms. Forbush

3

Examination

Mr. Radner

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E X H I B I T S

NO.

MARKED

1 Photograph

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2 Photograph

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7 Plaintiff's Response to Defendants' First Set
of Interrogatories and Requests for Production
of Documents

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Southfield, Michigan

Monday, August 26, 2019

At about 8:40 a.m.

- - -

BILLY GENE NORRIS, II,

after having been first duly sworn by the Notary Public to tell the truth, the whole truth and nothing but the truth, was examined and testified on his oath as follows:

(Exhibits Nos. 1 through 7 were marked for identification.)

MS. FORBUSH: Let the record reflect that this is the deposition of Billy Gene Norris, II, taken pursuant to Notice and in accordance with the Federal Rules of Civil Procedure, to be used for all purposes contemplated by those rules.

EXAMINATION

BY MS. FORBUSH:

Q Sir, can you state your full name for the record?

A Billy Gene Norris, II.

Q All right. And, Mr. Norris, what's your date of birth?

A I was told it's 07-19-1965.

Q Are you in doubt of your date of birth or --

A Well, it's second-hand knowledge, I mean.

1 Q Do you have a birth certificate?

2 A I don't have one on me, no.

3 Q Well, have you ever looked at your birth certificate?

4 A Yes, I have.

5 Q Would you have any reason to doubt that you were born
6 on July 19th, 1965?

7 A No, I don't.

8 Q How did you get to the deposition today?

9 A I drove.

10 Q By yourself or with someone?

11 A My mom. She's sitting out in the lobby here.

12 Q And what's your mom's name?

13 A Gloria.

14 Q What's Gloria's last name?

15 A Needham.

16 Q Can you spell it, please?

17 A N-e-e-d-h-a-m.

18 Q And where do you currently reside?

19 A At 36840 Chase, Romulus, Michigan 48174.

20 Q How long have you lived there?

21 A About three years now.

22 Q And do you live with anyone?

23 A My mom and my stepfather.

24 Q And what's your stepfather's name?

25 A James Needham.

1 Q Does anyone else live at the home?

2 A No.

3 Q Is this your mother's home or your stepfather's home?

4 A My stepfather's home.

5 Q All right. Do you pay rent?

6 A Well, I do chores for them and stuff. My stepfather's
7 getting up there in age, and he's got a bit of a, I
8 don't know, dementia or whatever. He comes and goes,
9 you know. I've got to protect him kind of. He wants
10 to go places, and he can't.

11 Q All right. And what kind of vehicle did you drive
12 yourself in here today?

13 A 2003 Honda Odyssey.

14 Q What color is that?

15 A White.

16 Q And who is that registered to?

17 A My mother, Gloria Needham.

18 Q Do you own your own vehicle?

19 A No. I don't have -- well, I have a van, a 1979 van.
20 It's like a bread truck, UPS truck.

21 Q Do you use that for work, or is that for transporta-
22 tion only?

23 A No. It's for storage right now.

24 Q What do you store in there?

25 A Some of my personal belongings, tools and stuff.

1 Q You've been deposed before, correct?

2 A Yep, by you.

3 Q Yep. Well, you've given more than one dep, haven't
4 you?

5 A Well, yeah, yeah. I have for accidents and stuff like
6 that.

7 Q All right. And you understand that if at any time you
8 don't understand my question or would like me repeat
9 it or rephrase it, I'd be happy to do so; otherwise,
10 if you answer the question, I'm going to assume you're
11 answering it truthfully, correct?

12 A Correct.

13 Q If you need to take a break at any time, just let me
14 know. I'm happy to do that. All I ask is that if a
15 question is pending, that you answer that question,
16 fair?

17 A Okay.

18 Q All right. So, how many lawsuits have been filed on
19 your behalf that you're aware of?

20 A You mean total?

21 Q Yeah.

22 A Probably four that I can think of.

23 Q When was the first one?

24 A Whew. I can't even think of what year it was. It was
25 a product liability. Epil-Stop, it burned my face.

1 Q I'm sorry. What was that?

2 A Epil-Stop. It's a hair depilatory and, you know, it's
3 supposed to cut down on your shaving or whatever.

4 Q How long ago was that?

5 A Oh, gosh. 1999 maybe.

6 Q And what happened with that lawsuit?

7 A It settled.

8 Q For how much?

9 A Six thousand.

10 Q And then when was your next lawsuit?

11 A I think it was my shoulder, my car accident.

12 Q And when was that?

13 A 2009.

14 Q And what was the result of that lawsuit?

15 A What do you mean, settlement?

16 Q Yeah. It settled?

17 A Yeah, for like 98,000.

18 Q All right. And then your next lawsuit?

19 A I believe it would be Turner.

20 Q When you say that, Derek Turner?

21 A Yep.

22 Q And that one also settled, correct?

23 A Yep.

24 Q And how about your fourth lawsuit, is it this one?

25 A That would be this one, wouldn't it? I think.

1 Q Any other lawsuits that you recall?

2 A Nothing that I can think of right now, no.

3 Q All right. And in the car accident, --

4 A Uh-huh.

5 Q -- what type of injuries did you sustain?

6 A Partially detached bicep tendon.

7 Q What arm?

8 A My right arm.

9 Q Any other injuries?

10 A My neck and my back.

11 Q As a result of the incident that we're here on today
12 have you sought any medical treatment?

13 A I went to the hospital that night, but I wasn't
14 getting any -- you know, I was just sitting there
15 waiting and waiting and waiting and, you know, nobody
16 came in, so I ended up leaving. But there was
17 bruising on the inside of my arm and stuff. I have
18 pictures of it, which I didn't get until two days
19 later, because I didn't notice it until then.

20 Q So, you went to which hospital?

21 A Annapolis. It's Beaumont. It's Annapolis on Howe
22 Road, I think.

23 Q And did you register as a patient there?

24 A I signed in and everything, yes. But, like I said, I
25 wasn't -- they weren't too worried about my, you know,

1 my problems at the time. So, I was like waiting and
2 waiting and felt like I was just forgotten about, so I
3 ended up leaving.

4 Q Did you go anywhere else for treatment?

5 A No, I went home.

6 Q And at any other time since then, and that would've
7 been --

8 Did you go to Beaumont on June 14th,
9 2018 or would it have been the next day?

10 A No, it was that night I went, that night.

11 Q All right. Other than going on June 14th, 2018, did
12 you go anywhere else for treatment?

13 A No.

14 Q Are you claiming as you sit here today that you have
15 any physical injuries as a result of the incident on
16 June 14th?

17 A No, I'm not, no.

18 Q Have you had to seek any psychiatric, emotional
19 counseling, therapy as a result of the incident?

20 A No, I have not.

21 Q Do you have any plans to?

22 A Not really. I couldn't afford it if I wanted to, so I
23 just confide in friends.

24 Q Who do you confide in?

25 A Family members and friends.

1 Q All right. Give me their names.

2 A Oh. (Laughing.) Give you their names? People I've
3 talked to. My mom. Can't talk to my stepdad about
4 it. My dad.

5 Q What's your dad's name?

6 A Billy Norris.

7 Q Where does he live?

8 A Hale, Michigan.

9 Q How often do you see him?

10 A Oh, couple times a year maybe.

11 Q Do you talk regularly on the phone or --

12 A No, un-uh.

13 Q Who else do you confide in?

14 A Whew. My wife.

15 Q What's her name?

16 A Marsha.

17 Q What's Marsha's last name?

18 A Norris.

19 Q And where does she live?

20 A Ohio. Jackson Center, Ohio.

21 Q How long has she lived there?

22 A Oh, probably five years.

23 Q Are you divorced?

24 A No.

25 Q Separated?

1 A Yeah, somewhat.

2 Q When's the last time you and Marsha lived together as
3 husband and wife?

4 A Oh, in -- whew. I would have to say probably 2004,
5 something like that. No, wait. Say probably 2012.
6 I'm sorry.

7 Q When were you married?

8 A Well, August 26th. I'm really not sure on the year.
9 I'm sorry. It was the year of the blackout, when the
10 power went out. I can't remember. I'm sorry.

11 Q Well, do you know how many years you've been married
12 approximately?

13 A Whew. No. (Laughing.) I couldn't think of it.

14 Q More than 10?

15 A Oh, yeah.

16 Q Do you have any children?

17 A Yes.

18 Q How many?

19 A One.

20 Q Son? Daughter?

21 A My son.

22 Q And his name?

23 A Billy.

24 Q III?

25 A Yep.

1 Q And where does he live?

2 A He lives with his mother.

3 Q And how old is Billy?

4 A He's 10.

5 Q And how often do you see him?

6 A As much as possible.

7 Q What does that mean, once a year?

8 A Oh, no. It's every few months, if possible. I mean,
9 as much as possible.

10 Next week I plan on going down.

11 Q Where do you stay when you go down there?

12 A With them.

13 Q Do you have plans to get a divorce or --

14 A No.

15 Q You're married, and you just don't live together?

16 A No. Situations came up, and we can't live together
17 right now.

18 I think she has some psychological
19 issues and stuff. It's like her mother died on her
20 birthday, and she's just not been able to get over it.
21 And the year prior to that her brother died, you know,
22 and she's just -- it's been a lot of weight on her
23 shoulders and stuff.

24 And her family all moved to Ohio, so
25 she felt like she's abandoned or whatever, and then

1 she ended up -- they offered to help her out to come
2 down there and stay, so she did.

3 Q So, who does she live with?

4 A She lives with my son.

5 Q Well, if she has these psychological issues, is she
6 okay to raise your son by herself?

7 A Oh, yes.

8 MR. RADNER: I'll object. This is
9 getting really irrelevant.

10 Q (By Ms. Forbush): Yes, you said?

11 A What was the question?

12 Q That she's capable of raising your son?

13 A Oh, yes, most definitely.

14 Q Anybody else you confide in?

15 A No, not that I can think of.

16 Q What have you done to prepare for your deposition
17 today, if anything?

18 A Tried to get some rest.

19 Q How much rest did you get?

20 A Oh, I probably got about, I don't know, five hours of
21 sleep last night.

22 Q Have you smoked any marijuana today?

23 A No.

24 Q When's the last time you did that?

25 A Last night.

1 Q What time?

2 A Oh, I don't know, 11 o'clock.

3 Q Does that help you sleep?

4 A Yes.

5 Q Do you have a medical marijuana card or --

6 A Yes.

7 Q How long have you had that?

8 A Oh, I don't know, years. Since the beginning.

9 Q What do you mean "since the beginning"? I don't
10 understand.

11 A Since they started issuing them. Probably 2009.

12 Q And you've had one continuously?

13 A No. It expired at some point in the past.

14 Q Did you renew it?

15 A Yes, I have.

16 Q When did you renew it?

17 A Just, whew -- I don't know. Probably June.

18 Q June of 2019?

19 A Yeah.

20 Q When did it expire?

21 A Well, I'm not sure on the other one.

22 Q Who did you go to see for the renewal of your medical
23 marijuana card?

24 MR. RADNER: I'll place an
25 objection. All of this stuff is very irrelevant.

1 But go ahead and answer.

2 A Right there in Romulus. There's a doctor's office by
3 the city park there.

4 Q (By Ms. Forbush): Have you gone there just the one
5 time for the renewal?

6 A Yeah.

7 Q Who's your primary care physician?

8 A Dr. -- shoot. I can't think of his name. I can't
9 think of his name. Sorry.

10 Q Where's he located, do you know?

11 A Telegraph Road in Taylor.

12 Q But you've never sought treatment from your primary
13 care physician related to this incident, correct?

14 A No, no.

15 Q All right. So, are you currently employed?

16 A No.

17 Q When's the last time you were employed?

18 A 2009, prior to the car accident.

19 Q All right. And where did you work?

20 A Gouth Sheet Metal in Wyandotte.

21 Q Have you ever applied for Social Security disability?

22 A Yes.

23 Q How many times?

24 A Well, I applied twice.

25 Q Have you received it?

1 A Well, I won my case, but the settlement from the
2 Turner case made it so that I couldn't collect, I
3 don't know, Social Security, because I had such a
4 large sum of money at the time.

5 Q Have you reapplied since then?

6 A I don't need to reapply. I need to let them know I'm
7 broke, and then my income will start coming in.

8 Q You're broke?

9 A That I have no money. They said I can't have any
10 until I dispose of the money I have from the Turner
11 case.

12 Q And how much was it that you got from the Turner case?

13 A How much did I get?

14 Q Yes.

15 A Fifty-nine thousand.

16 Q And what did you do with all of that money?

17 A I had fun.

18 MR. RADNER: Objection.

19 THE WITNESS: Sorry.

20 A (Continuing): I had fun with it.

21 Q (By Ms. Forbush): What did you do for fun?

22 A Casinos all across the country, done a little
23 traveling.

24 Q Did you take your son with you?

25 A No.

1 Q Did anybody go with you?

2 A Just myself.

3 Q So, you're claiming now that you're broke and you have
4 no money?

5 A Well, I'm back to where I started before, yes.

6 Q Well, if I remember from before, you were out collect-
7 ing cans from dumpsters or something.

8 A Out of trash cans and stuff, yeah.

9 Q So, that's what you're doing now?

10 A Oh, I don't have to do that now. I'm not homeless at
11 the moment, like I was before.

12 Q Okay.

13 A I mean --

14 Q You're able to live with your mom?

15 A Yeah. I have some support. I have some support from
16 outside. Before, I was living in a dilapidated house,
17 if you remember, that I bought from a tax sale for
18 1700 bucks and spent four years in it.

19 Q So, what do you do for income?

20 A Nothing right now.

21 Q You're waiting for your next settlement or --

22 A I guess.

23 Q So, have you notified Social Security that you don't
24 have any money?

25 A No, I have not, not yet.

1 Q Why not?

2 A Because I haven't -- I figured I'd wait and see what
3 happens here. If this is going to take a while, then
4 I'll tell them that I'm needing my assistance.

5 Q Do you get food stamps?

6 A Yes, I do.

7 Q How long have you been getting food stamps?

8 A Just a few months now.

9 Q Did you get them previously?

10 A Prior to the settlement before, --

11 Q Yeah.

12 A -- the Turner settlement? Yes.

13 Q How much do you receive monetarily?

14 A I think it's like 183 a month.

15 MR. RADNER: You're talking about
16 food stamps, right?

17 THE WITNESS: Yes. That's all I get
18 is food stamps, no money.

19 Q (By Ms. Forbush): How much marijuana did you smoke
20 last night?

21 MR. RADNER: Objection, relevance.

22 THE WITNESS: What's that?

23 MR. RADNER: Go ahead and answer.

24 A Oh, I don't know. Maybe a joint.

25 Q (By Ms. Forbush): Who do you smoke with?

1 A Myself.

2 Q Your mom and stepdad don't smoke?

3 A No.

4 Q Do you have a valid driver's license?

5 A Yeah.

6 Q Have you ever been arrested before? Well, I know you
7 have.

8 How many times have you been
9 arrested?

10 A Oh. Well, I got picked up in Romulus for a tres-
11 passing warrant in South Rockwood. I was out there
12 swimming in a quarry and got a ticket in the mail.
13 Just ignored it, because I was traveling. I was like
14 19 or 20 at the time, and I was moving furniture
15 cross-country, and so I just let it go. And then I
16 ended up getting a warrant check, and there was a
17 warrant out for me, and they took me into Romulus.
18 South Rockwood was going to come and get me. Called
19 my dad, and he came and bailed me out.

20 Q Any other arrests?

21 A No, that's about it, really, that I can think of.

22 Q How about schooling? Did you graduate high school?

23 A No.

24 Q Last grade completed?

25 A Eleventh. I went over my days of --

1 Q Pardon me?

2 A I went over my days of allowed tardiness or late or
3 absentee days, so they -- you know, I wouldn't get
4 credit for -- you know, I missed too many days, so my
5 counselor recommended that I go to night school, and I
6 wasn't going to go to night school. I wasn't living
7 at home at the time. I was living with a friend. He
8 got sick of waking me up in the morning for school, so
9 that's why I went over my days. My fault, you know,
10 for not waking up, but -- then I just started working,
11 moving furniture. You know, 18, 19 years old, and
12 then, you know, moved forward in my life.

13 Q All right. Did you ever get your GED?

14 A Yes, I did.

15 Q When did you get that?

16 A I think '96. I'm not really sure. I went to check to
17 see if they were giving the test, and they were, and I
18 took it that day, the first half, and then the second
19 half. Apparently I passed it.

20 Q Have you filed any income tax returns in the last 10
21 years?

22 A No, I have not. I haven't had any income.

23 Q Did you win any money at any of these casinos that you
24 traveled to?

25 A No.

1 Q No?

2 A I wish.

3 Q Did you ever receive Social Security benefits?

4 A Yeah. Well, I did. I got -- what was it? They
5 started putting some money in the bank -- not very
6 much -- and then being that I had money, they said
7 that I -- there was a couple months where they're
8 saying that I -- or I was up good for -- you know, I
9 was entitled to a certain amount up to a certain
10 point, and being that the settlement came in, I'm cut
11 off until I dispose of that money, like if I buy a
12 house or a car or something like that, and then when
13 I'm back down to zero they'll start giving me my 750 a
14 month, which I have to dispose of every month. If
15 there's anything left over, then they deduct it from
16 the next payment.

17 Q All right. So, you got the \$59,000 settlement. Did
18 you use it to buy a house?

19 A No, I did not.

20 Q Did you use it to buy a car --

21 A Oh, yeah.

22 Q -- or any transportation?

23 A I bought a car. I bought a moped. I bought a
24 bicycle.

25 Q What kind of car did you buy?

1 A The Honda, the Honda Odyssey. I bought it in Arizona,
2 and to get it back to Michigan my mother put it in her
3 name and insured it, so I could get it back here.

4 Q Why would you be prevented from doing that? I don't
5 understand. Why couldn't you do it in your name?

6 A Because I couldn't drive it cross-country without no
7 plates or anything on it.

8 Q So, how did you get it here?

9 A I drove it.

10 Q Okay. So, why did you have to put it in your mom's
11 name and not your name?

12 A Well, initially it was her vehicle.

13 Q The Honda Odyssey, you bought it from your mom?

14 A No. See, she does real estate out there, and it was a
15 real estate deal. She sold a trailer for somebody,
16 and she took the van as her commission, because she
17 knew I was looking for a van. I gave her the money
18 for the van. She plated and insured it so we could
19 get it back to Michigan.

20 Q How much did you pay for the van?

21 A A thousand dollars.

22 Q And you didn't buy any kind of house or anything like
23 that?

24 A No.

25 Q Were you paying your mom rent?

1 A (No response.)

2 Q Were you staying with her during this time?

3 A Like I say, I do favors for them, you know.

4 Q All right. So, the other \$58,000 you just spent
5 traveling and --

6 A Bought my son a bicycle, bought my wife a bicycle,
7 bought them clothes, you know, things that are nice to
8 have, I guess, you know.

9 Q And you bought a moped?

10 A Yes.

11 Q Do you still own the moped?

12 A Of course.

13 Q How far do you live from the Romulus Police
14 Department?

15 A Oh, two-tenths of a mile.

16 Q How many times have you been to the Romulus Police
17 Department?

18 A Multiple times.

19 Q When was the first time you were at the Romulus Police
20 Department?

21 A First time in my life?

22 Q Yeah.

23 A Oh, whew.

24 Q Other than your arrest for trespassing when you were
25 19.

1 A I don't know. They got a paper there, and you usually
2 can go into the little vestibule there and grab a
3 newspaper.

4 Q Okay. Do you go in there daily?

5 A No. It's a weekly paper, but you can stop in and, you
6 know, read the bulletin board and stuff.

7 Q Okay. So, in the last five years how many times have
8 you been to the Romulus Police Department?

9 A Whew. In five years? Probably, I'd say on average,
10 five times a year, so 25 times over the five years.

11 Q And of those five times a year are you ever there for
12 any official reason or just to read the paper or what?

13 A Well, get the paper, read the bulletin board; that's
14 about it.

15 Q Do you ever talk to anybody when you come in?

16 A No, not usually, not always.

17 Q Do you go to other agencies and read their bulletin
18 boards?

19 A I've been to Dearborn Heights, been to Westland;
20 that's about it.

21 Q What do you do at the Dearborn Heights Police
22 Department?

23 A Well, I'm looking for somebody there I've known in the
24 past that knows somebody that I know.

25 Q What about the Westland PD, why do you go there?

1 A It's just -- I don't know. I just go to Westland.
2 I've been in the area.

3 Q You just drop in at the police department for no
4 reason?

5 A No, no, not always. But I've been there, been to the
6 courthouse.

7 Q For what?

8 A Just to look around.

9 Q And what have you been to the Westland Police
10 Department for?

11 A Just to look around.

12 Well, I had the incident there where
13 I got a ticket for jaywalking, and another lying
14 police officer saying that I -- called it jaywalking
15 when it wasn't jaywalking, so I had a \$90 ticket, you
16 know, I had to pay.

17 Q I'm sorry. Did you say "another lying police
18 officer"?

19 A Yes, yes.

20 Q Did you pay the ticket?

21 A Well, yeah. I fought it as best I could, but the
22 prosecutor told me they didn't have to look at my
23 paperwork, they can ignore it.

24 Q Have you encountered a lot of police officers that
25 have lied to you?

1 A Yes, yes.

2 Q Where?

3 A All over the place.

4 Q Do all police officers lie to you generally?

5 A I'd say a lot of them do.

6 Q You don't like the police?

7 A I don't like bad cops.

8 Q You don't respect the police?

9 A I don't like bad cops.

10 Q How many bad cops have you met?

11 A Quite a few.

12 Q Like how many, five, 25?

13 A I'd say nine out of 10 of them are bad. They get
14 power hungry and power tripping.

15 Q How many encounters have you had with all of these
16 police officers?

17 A Countless over the years.

18 Q Related to what?

19 A Well, I don't know. Like digging in the dumpster and
20 getting locked in the back of the police car and then
21 my vehicle searched while I'm locked in the back of
22 the police car, which is a total violation of my
23 rights.

24 Q Where did that happen?

25 A In Westland.

1 Q What did you do about it?

2 A Nothing. I was ignorant at the time. I didn't know
3 what I know now.

4 Q What do you know now?

5 A Enough.

6 Q Enough so that you deliberately go around and try to
7 provoke police officers --

8 A No.

9 Q -- to engage with you?

10 A No, no.

11 Q You don't do that?

12 A No, I don't.

13 Q You don't deliberately try to provoke police officers?

14 A No, I don't.

15 MR. RADNER: Objection. It was
16 asked and answered.

17 Q (By Ms. Forbush): Do you go through dumpsters in
18 Romulus?

19 A No. I haven't had to do that in a while.

20 And the dumpsters, like Staples,
21 because they throw out reams of paper, stuff like
22 that, ink, you know, computer supplies. You know, I
23 have an adequate supply of blank DVDs and stuff from
24 them just throwing them away.

25 Q What kind of camera do you own?

1 A Canon.

2 Q Like Canon what? Is it a video camera or --

3 A Yeah, video camera.

4 Q When did you purchase that?

5 A Probably four days prior to this incident.

6 Q And why did you buy a video camera?

7 A Because I wanted to have it.

8 Q What do you film on it?

9 A Anything I can see.

10 Q Well, other than filming the exterior of the police
11 department and the vehicles going in and out, have you
12 filmed anything else on that camera?

13 A Yeah, my son, friends, family.

14 Q Do you own any firearms?

15 A Yes.

16 Q How many?

17 A Well, I have a .22 and an SKS.

18 Q I don't know what that is. What's an SKS?

19 A It's what you call an assault rifle, I guess.

20 Q Like an AR-15 or something?

21 A Like an AK.

22 Q AK-47?

23 A Yeah. It's the same, same caliber.

24 Q When did you buy that?

25 A Oh, gosh. Probably 2007.

1 Q Where do you keep this gun?

2 A It's in the attic.

3 Q At your mom's house?

4 A In the garage in the attic, yeah.

5 And then I have a .22 Marlin.

6 Q What do you use these guns for?

7 A I don't, really. Fun shooting.

8 Q How long have you owned the Marlin?

9 A Since I got it on my 16th birthday.

10 Oh. And then I have a .410 shotgun
11 that I got when I was 13.

12 Q Any other firearms?

13 A Nope.

14 Q Do you own any handguns?

15 A I did, but they got stolen -- one got stolen, and I
16 sold one to my brother.

17 Q What's your brother's name?

18 A And I had a Taurus .45 that I sold to a friend of a
19 friend.

20 Q What's your brother's name?

21 A My half-brother Billy? I mean --

22 Q The brother you said you sold the gun to.

23 A Kevin.

24 Q Kevin what?

25 A Norris.

1 Q Where does he live?

2 A He lives in South Carolina right now.

3 Q When's the last time you talked to him?

4 A Oh, gosh. Probably five years.

5 Q Do you have any other brothers or sisters?

6 A Well, I have a half-sister, Julie.

7 Q What's her last name?

8 A Murphy.

9 Q Where does Julie live?

10 A Canton.

11 And then I have stepbrothers and
12 stepsisters.

13 Q From Mr. Needham?

14 A No. He had one daughter. She passed away.

15 Q Have you ever been under the care or treatment of a
16 psychologist or psychiatrist?

17 A Nope.

18 Q Have you ever had to go through any kind of substance
19 abuse counseling or therapy?

20 A Nope -- well, I had a drunk driving when I was 21, and
21 I had to go classes, whatever.

22 Q What agency arrested you for drunk driving?

23 A Oh, Van Buren.

24 Q Is that a township, county?

25 A Van Buren Township.

1 I can't tell you what year it was.

2 I was probably 22. It was a while ago.

3 Q Any other arrests that you haven't told me about?

4 A Not that I can think of, no.

5 Q Where did you buy your camera from?

6 A Best Buy.

7 Q How much was it?

8 A Like 460 bucks.

9 Q So, that was in June of 2018?

10 A Uh-huh.

11 Q Yes?

12 A Yes.

13 Q When did you apply for Social Security disability?

14 A I think 2009. I was turned down. Then I called -- I
15 had an attorney -- agency help me with the second
16 application.

17 Q When was that?

18 A Just the past few years now. I can't think of the
19 years, but --

20 Q Was it before you bought your camera?

21 A Oh, yeah. I had the camera with the Turner settle-
22 ment.

23 Q What's the nature of your disability, as you under-
24 stand it?

25 A I don't know.

1 Q Do you have some kind of physical disability that
2 precludes you from working?

3 A Yes.

4 Q What is that?

5 A Well, my shoulder and my neck, and I don't get rest.

6 Q Why don't you get rest?

7 A Because of the discomfort that I'm in.

8 Q From your shoulder and your neck?

9 A Yes.

10 Q Did you have a doctor fill out disability forms for
11 you on the medical portion of the application?

12 A No. I don't think so. I just collected my medical
13 records and sent them to Social Security, which they
14 reviewed them, and then ended up having a hearing and
15 that, and they determined that I meet the qualifica-
16 tions.

17 Q Since your car accident in 2009 have you ever tried to
18 return to work?

19 A Not full time, no, not a regular job.

20 Q Well, any part-time work?

21 A No.

22 Q Well, when you say "not any regular job," what kind of
23 job are you talking about?

24 A Something that's 40 hours a week and you can make, you
25 know, a decent living at.

1 Q Well, have you had any employment since 2009?

2 A No.

3 Q Have you applied for any employment since 2009?

4 A No.

5 Q All right. So, you bought this \$460 camera from Best
6 Buy in June of 2018, right?

7 A Yep.

8 Q When was the first time you used it?

9 A Around the house just, you know, shooting a video of
10 my wife and my son.

11 Q Your wife and son were in town after you bought the
12 camera?

13 A Yeah. They were there on the day that the incident
14 happened.

15 Q Where do they stay when they come to town?

16 A With me.

17 Q At your mom's?

18 A Yeah.

19 Q Does your wife own a vehicle?

20 A No.

21 Q How did she get from Ohio to Michigan?

22 A I went and got her.

23 Q What vehicle did you drive?

24 A The van.

25 Q The white van?

1 A Yeah.

2 Q All right. So, what happens? You decide to go to the
3 Romulus Police Department, and what date was that?

4 A June 14th.

5 Q What day of the week was that?

6 A I don't really remember what date of the week it was.
7 They're all Saturdays.

8 Q Pardon me?

9 A They're all Saturdays.

10 Q When you don't have a job, every day is a Saturday?

11 A Yeah.

12 Q Okay. So, what time of day did you go to the Romulus
13 Police Department for the very first time that day?

14 A Well, it wasn't -- see, what piqued my interest, there
15 was a police vehicle following another vehicle through
16 town very closely, and I was waiting for his lights to
17 go on to pull the guy over, and they did. And as soon
18 as he hit Olive Street there and Goddard, he turned,
19 made a left turn, and then he pulled right in front of
20 the police station and left the vehicle on the wrong
21 side of the road in front of the police station. And
22 that was when I was on my way back from the store that
23 I'd seen this. I was on a bicycle. So, I decided I
24 was going to go home and get my camera and get a
25 picture of that police vehicle parked on the wrong

1 side of the road in front of the police station, but
2 by the time I had gotten back up there the police
3 vehicle had been moved, and so I just decided to take
4 some shots of the police department.

5 Q Okay. But my question was: What time of day did you
6 go to the police department on the 14th of June, 2018?

7 A It was probably quarter to 3:00, 2:45.

8 Q Prior to 2:45 p.m. --

9 Well, what time did you get up that
10 day?

11 A I couldn't tell you.

12 Q No idea?

13 A Nope.

14 Q Was it 6:00 a.m. or 11:00 a.m.?

15 A I have no idea.

16 Q What time do you normally get up?

17 A When do I go to sleep is the problem. I don't have
18 any sleep. I'm up and down throughout the night, so I
19 don't get no regular sleep.

20 Q So, other than marijuana, do you take any other drugs?

21 A No. I drink a couple beers once in a while.

22 Q How much marijuana did you smoke on the 14th?

23 A That day, none.

24 Q How about the day before?

25 A None.

1 Q How come?

2 A Because my card wasn't new. That's what I was doing,
3 I was going up to the pot doctor's office to get my
4 license renewed on June 14, and that's when I seen the
5 police car parked in front of the police station, you
6 know, and the incident of him following the truck. I
7 mean, he was four feet from the guy's bumper, you
8 know, real, real close.

9 Q Do you know who was in that car?

10 A No idea. No idea.

11 Q And in the police car?

12 A No idea.

13 Q Well, as I recall from your prior deposition, I mean,
14 you didn't have a medical marijuana card, but you
15 smoked marijuana.

16 A No. I had a card then.

17 Q I believe you testified it expired.

18 A Right. It might've been expired.

19 Q But the fact that your card was expired didn't stop
20 you from smoking marijuana, based on your prior
21 testimony.

22 A Right.

23 Q Is it different now? Are you telling me when your
24 medical marijuana card expired a few years ago, that
25 from that point on you didn't smoke marijuana until

1 you had a valid card, is that your testimony?

2 A No. It's not my testimony. But I probably didn't
3 have any at the time, and I wanted to get my card
4 renewed, because it's not like I can go to the store
5 and buy it without the card being renewed.

6 Q You probably didn't have any or you didn't have any?

7 A I don't recall.

8 Q Then how do you know you didn't smoke marijuana that
9 morning or the day before if you don't remember?

10 A Because I was anxious in getting my card so I could go
11 to the store and buy some. Don't you get that?

12 Q So, you ride your bike up to what? Did you call it
13 the pot doctor? Is that what you called it?

14 A Yeah. It's right there in Romulus. I couldn't think
15 of his name. It's on Goddard.

16 Q Did you go inside?

17 A No. He was closed that day.

18 Q And then where did you go on your bike?

19 A I was on my way back home, and that's when I seen the
20 police car parked in front of the police station.
21 Went home, walked back to the police station. The
22 police vehicle was moved by that time, so I decided to
23 get shots of the building just, you know, for raw
24 footage.

25 Q Raw footage of what?

1 A For creating a video, an edited video later, you know,
2 like scenes.

3 Q Were you making a movie or a documentary or something?

4 A Not yet, but I will.

5 Q About what?

6 A Whatever. I don't know. We'll see what the subject
7 turns out to be.

8 Q Have you ever made a movie before or --

9 A No.

10 Q -- a documentary?

11 A No.

12 Q How many hours have you used your video camera?

13 A Oh, you mean total video on it? Probably just a
14 couple hours' worth on it.

15 Q All right. So, do you tell mom, stepdad, wife, son,
16 "Hey, I'm back. I'm walking up to the police
17 department" or --

18 A No.

19 Q Why not?

20 A Because they would've stopped me.

21 Q Why would they have stopped you?

22 A Because they think I'm going to get killed.

23 Q Because they're afraid you're going to provoke the
24 police in some fashion?

25 A Well, I might get a psycho, and he might just decide

1 to off me.

2 Q You're not the psycho, the police are the psycho?

3 A I'm not saying all police are, but there are ones,
4 where it goes to their head and they get power hungry
5 and they get used to it. It's just --

6 Q And you have knowledge of these nine out of 10 bad
7 cops, and you walk up to the police department to see
8 if you can provoke or incite some kind of incident so
9 you can file a lawsuit and get some money to live on,
10 fair?

11 A No, not at all.

12 Q No, not at all?

13 So, you don't tell your family where
14 you're going or what you're doing, because they will
15 stop you from this behavior, correct?

16 A Well, they think that I'm going to run across a rogue
17 cop that's going to kill me.

18 Q All right. So, you walk back to the police depart-
19 ment. Tell me, what streets do you take to get there
20 from your home?

21 A The only ones I can think of is Olive and Goddard, and
22 then I think it's Romaine and then Chase.

23 Q And you live on Chase?

24 A Yes.

25 Q And the police department is on Olive?

1 A Yes.

2 Q How long did it take you to walk there?

3 A Oh, five minutes maybe. I mean, it's two-tenths of a
4 mile.

5 Q And what did you film on your way of the police
6 department?

7 A Nothing.

8 Q Nothing?

9 A Not on my way there.

10 Q So, that raw footage didn't interest you. The police
11 department specifically interested you for filming,
12 correct?

13 MR. RADNER: I'm going to object.
14 This was asked and answered why he was filming.

15 A No. You're misunderstanding me. I went there to get
16 shots of the building; that's it.

17 Q (By Ms. Forbush): Right. You were interested in the
18 police department, nothing else?

19 A The building, yes, --

20 Q Okay.

21 A -- with the signage out in front and stuff like that.

22 Q What sign?

23 A It says "Romulus Police Department."

24 Q Did you film that?

25 A Yes, I did.

1 Q What else did you film?

2 A I got a couple shots of the building from different
3 sides, sally port entrance, and then from the corner
4 back down the street, you know, another shot of the
5 sign.

6 Q What street are you talking about now?

7 A Olive.

8 Q Okay. Did you go down any other streets?

9 A Biddle. Biddle is the street that is the entrance to
10 the back lot of the police station.

11 Q A secured entrance to the police department where the
12 officers enter and staff?

13 A Right.

14 Q It's off of Biddle, right?

15 A Yes, yes.

16 Q So, you got there, you filmed the front of the
17 building --

18 A Uh-huh.

19 Q -- on Olive Street?

20 A Yeah.

21 Q All right. And did you walk down the sidewalk --

22 A Yes.

23 Q -- and go down Biddle to film some more?

24 A Yes.

25 Q And there's a fence, a chain-link fence along the

1 police department on Biddle?

2 A Yes.

3 Q All right. Did you go inside that chain-link fence?

4 A No.

5 Q So, what did you do as you were walking down Biddle?
6 What are you filming?

7 A I was just walking down the sidewalk and just filming,
8 and as I approached the gated area, I guess where the
9 opening is, there was one car going in. I couldn't
10 see it. You know, I think it was a Ford.

11 Q Who was in that car?

12 A I believe this gentleman here.

13 Q Who? Who are you pointing at?

14 A This gentleman. I don't know his name.

15 Q You don't know his name?

16 A No.

17 Q How do you know him?

18 A How do I know him?

19 Q Yeah.

20 A Encounters that day at the police station.

21 Q Any other encounters, other than that day on June
22 14th?

23 A No, no, no. I've seen some video of him before that.

24 Q What video have you seen of him?

25 A There's a Stuber, Stubberd or whatever, Rupert

1 Stubberd or something like that.

2 Q Say it again.

3 A I can't think of the guy's name exactly.

4 Q Did you say Rupert?

5 A I think it's Rupert Stubberd or something like that.

6 I'm not --

7 Q Stubberd?

8 A Yeah. I'm not sure. But he's, I don't know, he's
9 like an autistic gentleman who keeps getting his
10 window broken out, because he drives around without a
11 license. I guess they won't give him a driver's
12 license, but he still wants to go places, so -- I
13 mean, he's done. He's up in Mexico now. (Laughing.)

14 MR. RADNER: Sorry. Do you mind if
15 we take a break?

16 MS. FORBUSH: Sure.

17 (Recess taken.)

18 MS. FORBUSH: Ready to go?

19 THE WITNESS: Sure.

20 Q (By Ms. Forbush): Mr. Norris, you had indicated that
21 you had watched a video of this officer prior to June
22 14th, 2018. What video had you observed?

23 A (No response.)

24 Q You told me about some autistic gentleman who now
25 lives in Mexico, but you didn't tell me what video you

1 saw.

2 A I don't know. They were knocking on the door and
3 asking -- I guess they were there for service, a
4 report of a female in distress and, you know, he
5 wouldn't let them in the door. Ended up, you know,
6 them calling him ma'am and stuff when they were
7 leaving, when he was clearly a man, just trying to
8 downplay it, you know, his disability and stuff,
9 making fun of him, I guess.

10 Q So, on the date that we're here about, the June 14th,
11 2018 date, you said you saw a Ford vehicle go into
12 where, the restricted parking lot in the back of the
13 police department?

14 A Yes.

15 Q All right.

16 A Yeah. It was entering through the gate. Well, when I
17 was on the corner, he turned the corner.

18 Q When you're talking about "the corner," you're talking
19 about the corner of Biddle and Olive?

20 A Yes.

21 Q Okay. Go ahead.

22 A And I was just getting my shots, you know, raw
23 footage, stuff that you cut in, you know, different
24 scenes or whatever.

25 Q Have you made other movies before?

1 A No, I haven't. I don't have any of those skills yet.
2 I mean, I'm working on it.

3 It's better to have the raw footage,
4 and then you can splice it together the way you want
5 when you learn how to do it.

6 Q All right. What other raw footage have you obtained?

7 A What, police departments? That's it. That was it,
8 the one, because I just had gotten the camera. Oh,
9 no. I got Van Buren too. I went over to Van Buren
10 too.

11 Q Van Buren Township?

12 A Yeah, and the courthouse. I've been to the courthouse
13 videotaping.

14 Q Do you go inside the courthouse when you're video-
15 taping?

16 A No. You can't get into the courtroom. They restrict
17 your First Amendment at the door for some reason.

18 Because it used to be, because of --
19 like when I had the Turner case, I was able to take my
20 tablet right in. And I had the police video from the
21 police car, showed the public, the public pretender
22 that I wasn't guilty, because he was telling me I was
23 guilty, because the officer said I was guilty, until I
24 proved it by the video. And he went in and talked to
25 the prosecutor, and the prosecutor nolo-ed the

1 charges.

2 Q What charges are you referring to?

3 A On the Turner case.

4 Q You said your "tablet." You have your tablet with you
5 today?

6 A Not the one that I had at the time. It's a little bit
7 smaller than that one.

8 Q But on the date of our incident in June of 2018 --

9 A Uh-huh.

10 Q -- you didn't have a tablet, did you? You had your
11 video camera?

12 A My video camera, yes.

13 Q And this is a handheld video camera?

14 A Yes.

15 Q Did you have your cellphone with you?

16 A Nope.

17 Q And you're recording your deposition here today as
18 well, correct?

19 A Just on audio.

20 Q Okay.

21 A I was told it was going to be video recorded, but
22 it's not, so -- I thought it was going to be video
23 recorded, you know, the deposition.

24 Q Oh, okay. So, you see a vehicle, a Ford vehicle, not
25 a police car, right, --

1 A No.

2 Q All right -- drive into --

3 A A Fusion.

4 Q -- the gated area?

5 A It was entering, yes, as I was approaching.

6 Q As I understand it, there's the gated area, and then
7 inside the gated area there's another gate that allows
8 you into the parking lot behind the police department.

9 A Well, the first part is open. There's a dumpster
10 there, and it's wide open, and then --

11 Q Did you go inside that initial gated area where the
12 dumpster is?

13 A No, I did not.

14 Q Why not?

15 A Why should I?

16 Q I don't know. Footage, raw footage.

17 A I can get my footage from the sidewalk.

18 Q Okay. So, you never left the sidewalk?

19 A Nope.

20 Q All right. Did you ever impede anybody's ability to
21 get in or out of the driveway?

22 A Nope.

23 Q Nobody ever honked at you to move?

24 A Well, yeah. There was a vehicle trying to enter, you
25 know, as the chief was talking to me. You know, he

1 had my attention, and I was videotaping that way.

2 But, no, I think there was plenty of
3 room for somebody to get in. And, besides, it's a
4 sidewalk. You know, you can be on the sidewalk. If
5 somebody wants to get in, they'll alert you to, "Hey."

6 Q And you heard the vehicle honk their horn --

7 A Right.

8 Q -- for you to move so they could enter?

9 A I backed up two steps.

10 Q Were you recording the keypad?

11 A No.

12 Q Did you see the keypad?

13 A No.

14 Q You never saw the keypad?

15 A No.

16 Q You never saw the stand that has the --

17 A No.

18 MR. RADNER: I'll object. Asked and
19 answered.

20 Q (By Ms. Forbush): I'm just asking: Do you know
21 there's a keypad that allows entrance?

22 A There's a post. There's a post sticking up there.

23 Q Yeah.

24 A A couple yellow posts.

25 Q When you saw this Ford Fusion go in did you see him do

1 anything --

2 A Nope.

3 Q -- at that post?

4 A Nope. I was too far away.

5 As I say, let's watch the video.

6 Q With all due respect, sir, this is my deposition.

7 I'll ask the questions.

8 A Okay.

9 Q So, if you'll just answer my questions, we can get
10 done more quickly, okay?

11 A Yep.

12 Q I'm not here to argue with you.

13 A All right.

14 Q All right. So, you see the Ford Fusion go in. What
15 do you do next?

16 A I continue walking.

17 Q You're standing at the corner of Biddle and Olive at
18 that point, right?

19 A Approaching that direction, walking that way.

20 Q Okay.

21 A Couldn't see a plate on the car. You know, I can
22 basically make it out that it's a Ford. You can
23 recognize it's a Ford. I can't remember if it was
24 silver or white.

25 Q When's the last time you watched the video?

1 A Last night.

2 Q Which video did you watch?

3 A I watched the one -- I watched my copy, not the Black
4 Label copy, which has been taken down.

5 Q What's the Black Label copy?

6 A Black Label is -- I don't know. Hayes, a lot of
7 people send him videos, and he posts them on his
8 channel.

9 Q Well, when you say you watched your video, are you
10 talking about the video from your camera, or are you
11 talking about --

12 A Yes, my camera, my raw copy.

13 Q All right. Did you ever watch the body camera videos
14 of any of the officers?

15 A Yes, I have.

16 Q When is the last time you watched those?

17 A Oh, it's been a while.

18 Q Did you see any dash cam videos?

19 A No. There are none that I'm aware of, that I can
20 think of.

21 Q All right. Whose body cameras have you watched?

22 A Several of the officers'. I wouldn't know whose I was
23 watching at the time.

24 Q But you haven't watched those in a while?

25 A No. I haven't watched them in a little bit, no.

1 Q You only watched the videotape that you actually
2 recorded from your camera, correct?

3 A Correct, yes.

4 Q Okay. And did you submit that video to Black Label?

5 A I sent him a copy of it.

6 Q All right.

7 A A link to, you know, my Google account, I guess, and
8 he had access to it. He must've downloaded a copy of
9 it, did his research and shot his video.

10 Q All right. Did you provide a copy of your video to
11 anyone else?

12 A Just my attorney. I mean, gave him a link, sent him a
13 link to it.

14 Q Anybody else?

15 A No, not that I can think of.

16 Q Send it to any family or friends?

17 A Just links to it, you know.

18 Q Yeah. Who have you sent it to?

19 A Oh. I showed it to my dad, showed it to my friends.

20 Q Okay. What friends have you showed it to?

21 A Oh, my wife, my friend Terry.

22 Q Terry who?

23 A Fournier.

24 Q How do you spell that one?

25 A F-o-u-r-n-i-e-r.

1 Q And Terry, is that male or female?

2 A Male.

3 Q Where does Terry live?

4 A Belleville, Sumpter.

5 Q Does he work?

6 A Yeah.

7 Q Where does he work?

8 A I think he's an independent contractor, drywaller.

9 Q Who else have you shown it to, other than your wife,
10 your dad and Terry Fournier?

11 A My mom; that's about it, that I can think of.

12 Q You didn't show it to your son?

13 A Yeah. My son seen it. He knows it by heart.

14 Q Anybody else?

15 A Nope.

16 Q Why did you show it to your wife?

17 A Just to show it to her.

18 Q Why?

19 A Why not?

20 Q You had no particular reason, just said, "Hey, look
21 what happened to me"?

22 A That's it.

23 Q How about Terry Fournier?

24 A "Look what happened to me."

25 Q When you met with Mr. Fournier and showed him the

1 video -- or did you send him a link?

2 A No, I went. He's not computer savvy, so --

3 Q So, you went to his house and took your tablet with
4 you --

5 A Yep.

6 Q -- and said, "Check this out"?

7 A Yep.

8 Q "I'm going to get another settlement. I'm going to
9 have more money. Let's go gambling"?

10 MR. RADNER: Form and foundation.

11 Q (By Ms. Forbush): That kind of conversation?

12 MR. RADNER: Form and foundation.

13 Q (By Ms. Forbush): Did you have a conversation with
14 him like that?

15 A Oh no, not really, no.

16 Q No?

17 A No, because they think I'm playing with fire.

18 Q And you enjoy that?

19 A Somewhat, yes.

20 Q All right. So, you're walking down the sidewalk along
21 Biddle. What do you do?

22 A What do you mean, what do I do?

23 Q What happens next? You see the Ford Fusion go in.
24 Tell me what happens next.

25 A I'm walking forward and videotaping, and just so

1 happened Chief Settles was on a bicycle.

2 Q Did you know Chief Settles before this date?

3 A Of course.

4 Q How did you know him?

5 A Well, I don't know. I've had run-ins with him before,
6 had a -- he called me a sovereign citizen in front of
7 the city council at a city council meeting; that's all
8 on video.

9 I actually was quite surprised he
10 would know who I was.

11 Q So, you've been to city council meetings?

12 A Of course.

13 Q How many times at Romulus?

14 A Oh, four or five times.

15 Q And why do you go to those?

16 A Just to see what's happening.

17 Q Do you always speak every time you go?

18 A No.

19 Q How many times have you spoken at these meetings?

20 A Once.

21 Q Was that related to your arrest by Mr. Turner?

22 A Yes, it was.

23 Q What was the purpose of your speech? What were you
24 talking about?

25 A I wanted them to settle the matter; that it would be

1 amicable for them to settle it without me having to
2 make it a federal case, which they just totally
3 ignored me.

4 Q And what did Director Settles say about you, that you
5 recall?

6 A That he called me a sovereign citizen. He was just
7 trying to downplay what had happened with the Turner
8 incident.

9 Q Do you consider yourself a sovereign citizen?

10 A No.

11 Q Do you have an understanding of what a sovereign
12 citizen is?

13 A Absolutely. The police are sovereign.

14 Q What do you mean by that?

15 A They're the ones who judge themselves and find that
16 they've done nothing wrong, and that's the definition
17 of a sovereign. You know, they're the ones who are
18 sovereign citizens.

19 Q Is anybody else a sovereign citizen?

20 A What do you mean?

21 Q Well, you said you knew what a sovereign citizen was.
22 You said the police are sovereign citizens. Is
23 anybody else, besides a law enforcement officer, a
24 sovereign citizen?

25 A The state. The state is sovereign.

1 Q Anybody else?

2 A I don't know.

3 Q You've never heard of a private citizen referring to
4 themselves as a sovereign citizen when they say, "I
5 don't pay taxes. I don't have a license plate. I
6 don't have a driver's license"? You don't know any-
7 body like that?

8 A No.

9 Q Okay. So, you're walking down the sidewalk on Biddle,
10 and you're filming. What are you filming?

11 A The back lot of the police department, --

12 Q And what --

13 A -- just because of the building.

14 Q What do you mean "just because of the building"?

15 A Just, you know, what's going on back there, people
16 coming and going.

17 Q So, you filmed the area where the security signs are
18 that you can't go into, correct?

19 A Yeah, from the sidewalk.

20 Q Like if we look at Deposition Exhibits 3 and 4, it
21 shows the keypad and the chain-link fence, correct, to
22 get into the back lot?

23 A Yeah, but that's a little bit further away than I was.

24 Because if you see this line right
25 here and this pole --

1 Q You have to tell me what exhibit you're referring to.

2 A Exhibit No. 4.

3 Q Okay. And what line are you referring to?

4 A To the yellow line that's on the opposite side of the
5 fence there and this pole. I had never gone past that
6 point with it, you know, if you were to line those up.
7 So, if you take that line --

8 I have an overhead shot from Google,
9 if you --

10 Q No.

11 A Oh. You can't do that?

12 MR. RADNER: Just answer her
13 questions.

14 THE WITNESS: All right. I'm sorry.

15 Q (By Ms. Forbush): So, what was the point you were
16 trying to make by showing me the photograph?

17 A That I wasn't blocking the gate at all. There was
18 plenty of room. If the car was to come straight in, I
19 wouldn't have been in their way.

20 Q Well, you recall when you reviewed your video last
21 night there was a car that honked their horn --

22 A Correct.

23 Q -- at the time you were there, right?

24 A Correct.

25 Q And you moved as a result of that, is that right?

1 A I backed up two steps, yes.

2 Q And then it's your testimony that you never went past
3 the chain-link fence --

4 A Correct, and that sign wasn't there.

5 Q -- depicted in Exhibit No. 5?

6 Pardon me?

7 A That sign was not there.

8 Q And you're referring to the restricted area sign?

9 A Correct.

10 Q Can I have those back, please?

11 A Certainly.

12 Q All right. So, you're filming cars going in the back
13 lot of the police department?

14 A Not necessarily.

15 Q What happens? You said you saw Director Settles.

16 A Yes.

17 Q You said you'd had contact with Director Settles at a
18 Romulus City Council meeting.

19 A Uh-huh.

20 Q Had you had any other contact with him prior to this
21 incident?

22 A Yeah. I had a meeting with him in his office.

23 Q Related to the Turner --

24 A Yes.

25 Q --lawsuit?

1 A Yes.

2 Q Anything else?

3 A No -- oh, yeah. Well, there was. After this recent
4 incident I ran into him at city hall.

5 Q When was that?

6 A Oh, probably a week after the 14th. So, I went up
7 there to, I don't know, pay a water bill or something,
8 and he happened to be there.

9 Q Did you talk to him?

10 A Yeah.

11 Q What did you talk about?

12 A He just wanted to know why we did -- you know, why I
13 was doing what I was doing.

14 Q He asked you why you were filming the police depart-
15 ment?

16 A I don't really recall, but I have it recorded, so
17 you'll probably want a copy of that. And I haven't
18 listened to it.

19 Q What did you tell him?

20 A He just wanted to know why I do what I do, and I told
21 him, "It's just the things in the past. You know,
22 past experiences with police has made me what I am."

23 Q What are you?

24 A Someone who stands up for themselves.

25 Q Is that what it is --

1 A Yes.

2 Q -- that you're doing?

3 A Yes.

4 Q So, for instance, on the date that Derek Turner drove
5 by in his patrol car --

6 A Uh-huh.

7 Q -- and you flipped him off and gave him your middle
8 finger, --

9 A Uh-huh.

10 Q -- you were standing up for yourself, is that right?

11 MR. RADNER: Form and foundation.

12 A No. I was making a, I don't know, a statement, I
13 guess.

14 Q (By Ms. Forbush): Okay. But you weren't standing up
15 for yourself at that point?

16 A Oh, yeah. I was standing up for everybody.

17 Q By flipping off the police?

18 A Yes.

19 Q So, Director Settles is on a bicycle. Does he
20 approach you?

21 A Yeah. He's riding through the parking lot, and he
22 approaches the gate, and he asked me if he can help
23 me.

24 Q And what did you say?

25 A Nothing.

1 Q You just continue filming him?

2 A Yes.

3 Q Then what happened?

4 A Him and another officer approached me.

5 Q Who was the other officer?

6 A I don't know his name. This gentleman here.

7 Q You're pointing to the officer at your deposition
8 today?

9 A Yes.

10 Q And what happens when they approach you?

11 A (No response.)

12 Q You're still filming, I assume.

13 A Yeah.

14 Q What is said or done?

15 A It's all caught on video.

16 Q I'm asking for your memory.

17 A He wanted to know what I was doing.

18 Q Okay. What did you say?

19 A It's none of his business.

20 Q Is that what you said?

21 A I'm pretty sure that's what I said.

22 Q And then what happened?

23 A He explains that he had a problem with me filming the
24 police lot.

25 Q Who said that?

1 A Settles, Chief Settles.

2 Q Did he say why?

3 A He wasn't very clear on it. He just said they had an
4 issue with it.

5 Q And what did you say?

6 A You know, nothing really. I don't remember saying
7 anything.

8 Then he wanted to know why, and I
9 said, "Because I can."

10 Q Okay. What else happened? Tell me everything that
11 happened. Don't leave anything out.

12 A He started touching me, feeling around my waist and
13 everything. I didn't like it.

14 Q Did he say anything before he touched you?

15 A No, just started touching.

16 Q He never said, "I've got to check you for weapons"?

17 A Nope.

18 Q That's not on your video?

19 A Not on my video.

20 Q Really?

21 A Yeah. That's after, after I complained about it.

22 Q Where did he touch you? Where did he touch you?

23 A Around my waist, my belly.

24 Q Did he put his hand in your pants or --

25 A Well, not appropriate touching.

1 Q I want you to describe for me everywhere that Director
2 Settles touched you with his hands. Don't leave any-
3 thing out.

4 A He started touching on me, feeling on me.

5 Q Where?

6 A I moved.

7 Q I need to know where he touched you.

8 A Around my waist, my belly.

9 Q Was this the outside of your clothing, the inside of
10 your clothing?

11 A It was obviously the outside, because he was doing it
12 quickly.

13 Q A quick patdown of your pants?

14 A I guess. I didn't cooperate, because he didn't warn
15 me he was about to do that. He didn't say, "Stop.
16 You're under arrest."

17 Q When you say you didn't cooperate, what did you do?

18 A What was that?

19 Q You said, "I didn't cooperate, because he didn't warn
20 me." What did you do that was not cooperative?

21 A I was shocked that somebody started grabbing on me,
22 started feeling on me, and I wasn't, you know, aware
23 of it until it started happening, and that's why I
24 reacted to it.

25 Q What did you do? What was your reaction?

1 A I moved.

2 Q Okay. Where did you move?

3 A And I told him to stop.

4 Q You just said, "Stop"?

5 A Yeah, "Stop."

6 Q Or did you say anything else?

7 A "Stop touching me. Stop."

8 Q And then what happened? Don't leave anything out.

9 A He said he was checking me for weapons. And I told
10 him, "I have no weapons, so stop touching me," and so
11 I removed myself and started moving away.

12 Q What do you mean you removed yourself? What did you
13 do?

14 A I backed down the sidewalk. I was videotaping and
15 continuing to get what was going on.

16 Q And what's being said at this point?

17 A The chief -- I don't know. The lady in the car gave
18 him a radio, and he made some sort of call for help, I
19 guess, or backup or something.

20 Q When you say "lady in the car," what lady are you
21 talking about?

22 A There was a lady that was pulling into the gate.

23 Q The one who beeped her horn at you?

24 A Right.

25 Q So, she gave the radio to the director?

1 A Chief Settles, yes.

2 Q Did you hear what he said on the radio?

3 A No. I couldn't hear what he said.

4 Q What were you doing at this point?

5 A I was video recording.

6 Q Just standing there?

7 A Yep.

8 Q Not backing up anymore?

9 A No, I had backed up about 15 feet.

10 Q Where was the officer, the other officer?

11 A They were both standing at the gate still.

12 Q Both the chief and the officer?

13 A Yes.

14 Q And then what happened?

15 A They started approaching me, so I started backing up.

16 They were telling me to stop, and I told them I didn't

17 want to stop, and I didn't have to talk to them and

18 that I didn't want to, and they insisted.

19 Q How did they insist?

20 A Well, one of them grabbed my arm.

21 Q Which one?

22 A This gentleman here.

23 Q Okay. So, the officer grabbed your arm. Which arm?

24 A My right arm.

25 Q Did he grab it with one hand, two hands?

1 A First, I think it was one, and then he put the other
2 hand on top over here.

3 Q So, when he first grabbed you with his hand, which
4 hand did he grab you with, do you know?

5 A I don't know. I wasn't paying attention to that.

6 Q So, he grabbed your right arm. Where did your right
7 arm first get touched?

8 A Right here.

9 Q You're motioning to your upper bicep?

10 A Yep. And then Chief Settles was blocking the side-
11 walk, so I couldn't progress any further in that
12 direction.

13 Q What, he got behind you and blocked you from walking
14 toward Olive?

15 A (No response.)

16 Q Because you're backing up toward Olive.

17 A Well, I was backing up, and then they, you know, they
18 approached me really fast, you know, faster than I was
19 walking.

20 Q Were they running?

21 A No, faster than I was walking.

22 Q Backward?

23 A Yes. I was stepping backwards. I might've been like
24 forward, but -- because I can see the screen. As long
25 as I'm getting the shot and I can tell that it's in,

1 in the viewfinder or whatever.

2 I just indicated I didn't want to
3 talk to them, had no desire to talk to them, and I
4 wanted to be left alone.

5 Q Did Director Settles get behind you, and that's how he
6 stopped you from backing up?

7 A Yeah. They surround -- kind of surrounded me, you
8 know, blocking my way.

9 Q So, Director Settles and this other officer surrounded
10 you?

11 A Well, he grabbed hold of me on the arm, and then
12 Director Settles was right here so I couldn't move.

13 Q On your left side?

14 A Yeah, so that I couldn't move forward anymore.

15 Q I thought you were moving backward.

16 A Well, I might've been, but backwards is forward.

17 Q So, then what happens? The officer grabs your arm.
18 Chief Settles blocks your left side. What happens
19 then?

20 A They grab hold of me and snatched --

21 Q Who grabs hold of you? You need to be specific.

22 A The officer and --

23 Q I thought he already had ahold of your right bicep.

24 A Well, they got a little more forceful.

25 Q So, what happened? Tell me specifically what each

1 person did.

2 A They started twisting my --

3 Q You're saying "they." I need to know who touched you.

4 A Well, there's two people there -- three people.

5 Q All right. The chief --

6 A The chief, one officer and me.

7 Q Okay.

8 A Okay. "They" would be the officer and Chief Settles.

9 Q I want to know what the officer did. He's got you by
10 your right bicep. What else did he do, if anything?

11 A Squeezed my arm.

12 Q Okay. Did he do anything else?

13 A He kept ahold of my arm. Chief Settles grabbed hold
14 of my hand with my camera in it and started twisting,
15 twisting it out of my hand.

16 Q Did your camera fall on the ground?

17 A No. It was ripped from my hands.

18 Q By who?

19 A I believe Chief Settles.

20 Q Was your camera damaged?

21 A No, by my tripod was.

22 Q Where was your tripod?

23 A On the bottom of the camera.

24 Q So, you're carrying your video camera, and it's hooked
25 to a tripod, and you're walking down the sidewalk

1 filming. Is that what you're doing?

2 A Correct.

3 Q Did you ever have it set up on the tripod?

4 A No. The tripod was all collapsed, and I was using it
5 as a, you know, as a gimble or a stick, --

6 Q To hold it?

7 A -- just to hold it, yes.

8 Q So, it's your testimony that Chief Settles grabbed
9 your left arm. Where did he grab your left arm?

10 A I really couldn't tell you. It was too quick for me
11 to even notice.

12 Q What were you wearing?

13 A A white shirt and shorts; that's it.

14 Q Did you have any alcohol to drink that day?

15 A Nope.

16 Q Are you on any medication?

17 A Yeah. I'm on heart medication, blood pressure
18 medication.

19 Q Did you take your meds that day?

20 A I believe so, yes.

21 Q No other street drugs, --

22 A Nope.

23 Q -- anything like that?

24 A Nope.

25 Q So, the officer squeezed your right arm, and then the

1 chief grabbed your left arm and ripped the camera from
2 your left hand, is that right?

3 A Yes.

4 Q Did they do anything else to you physically? And be
5 specific. How about the officer first, other than
6 grabbing your right bicep, did he do anything?

7 A Well, they handcuffed me.

8 Q Who handcuffed you?

9 A I don't know. I couldn't see behind me. I couldn't
10 see who it was.

11 Q So, the officer has your right arm. Settles has your
12 left arm, takes your camera away.

13 A Uh-huh.

14 Q What happens next?

15 A They handcuff me. Chief Settles reaches into my back
16 pocket, pulls my ID out, pulls it out and reads it,
17 and then informs all the other officers that I just
18 sued the Romulus Police Department and, "This is the
19 guy that just sued us." Like, you know, in other
20 words, "This is the guy you want to get, guys."

21 Q But he never said that, though, did he?

22 A Well, he indicated it pretty much.

23 Q How did he indicate that? Tell me exactly what he
24 said.

25 A "This guy just sued us."

1 Q Okay. And that was true, right?

2 A Correct.

3 Q What else was said?

4 A That's about it, really. I told him that he's
5 screwing up, that they're messing up again, and that
6 they would be better off to just let me walk away
7 right now, but they weren't interested in that. And
8 he said that, he told me that they're going to do it
9 right this time. They're going to cite me and release
10 me. And I said, "It's still not right. I should've
11 never been touched."

12 Q Have you told me everything that the officer said to
13 you?

14 A Everything that I can think of.

15 Q Have you told me everything that Settles said to you?

16 A I imagine so, yes.

17 Q Do you know, in looking at Exhibit No. 6, whose
18 vehicle is contained in that picture or depicted in
19 that photograph?

20 A No, but that's the vehicle I was accused of parking
21 there. I believe it was one of the construction
22 worker's across the street, because they were tearing
23 up the -- I guess doing the water lines there or some-
24 thing.

25 Q When were you accused of parking there? I thought you

1 told me everything that was said to you.

2 A What do you mean?

3 Q You said somebody accused you of parking there. When
4 did that happen?

5 A During the meet -- during the confrontation, I guess.

6 Q Who accused you of parking there?

7 A Well, Chief Settles asked me if it was my vehicle, and
8 then he answered that yes, that was his vehicle.

9 Q Was that before or after you were handcuffed?

10 A Before.

11 Q Okay. So, is there anything else that these officers
12 or the chief said to you that you haven't told me
13 about? I asked you to tell me about everything, and
14 you didn't tell me about that.

15 A I don't know.

16 Q What else? What else did they say?

17 A Nothing, that I can think of.

18 Q So, the officer clearly thought for whatever reason
19 that was your vehicle, right?

20 MR. RADNER: I'll object. There's
21 no way he can know that.

22 Q (By Ms. Forbush): He voiced it, right, while you were
23 there. He said, "That's his vehicle," right?

24 A No. Chief Settles asked me, "Is that your vehicle?"
25 And I refu -- I wouldn't answer. I don't answer. All

1 right? I don't answer questions. And if I do, I
2 usually pause for seven or eight seconds prior to
3 giving an answer.

4 Q So, when Chief Settles asked you if that was your
5 vehicle, you had no intention of answering his
6 question?

7 (Cellphone interruption.)

8 MS. FORBUSH: I'm sorry.

9 A I felt it not necessary to answer his question.

10 Q (Continuing): All right. And then the officer stated
11 in response to Settles' question that it was your
12 vehicle?

13 A Yeah.

14 Q Do you remember anything else that the chief said
15 about the vehicle?

16 A That it's illegal parked, and I'm going to get a
17 ticket for illegally parking, and he needed my
18 driver's license and registration, at which point I
19 was trying to exit the situation.

20 Q So, you didn't provide your driver's license or
21 registration?

22 A For what? I wasn't driving. I walked. I shouldn't
23 have had it on me. I wish I would've stuck it in my
24 crotch.

25 MR. RADNER: Just try to answer.

1 THE WITNESS: I'm sorry.

2 Q (By Ms. Forbush): Is that where you typically carry
3 your driver's license?

4 A No, but they tend to not want it once it's there.

5 Q How do you know that?

6 A Because I've seen it on videos before.

7 Q But you've never done that?

8 A No. I never had the opportunity to do it yet.

9 Q But you plan on doing it in the future?

10 A Yeah, I may.

11 Q You don't know who handcuffed you, right?

12 A No.

13 Q And were you injured when you were handcuffed?

14 A Just the pain in my shoulder and that when they, you
15 know, turned my arm.

16 Q Did you tell them you were in pain?

17 A No. I told them after they had taken the handcuffs
18 off and that that, you know, putting my hand on top of
19 my head and bringing it back down gave me some dis-
20 comfort.

21 Q You said that out loud?

22 A Yeah. I think I said something like, "My shoulder's
23 screwed up," you know, and probably winced in pain,
24 you know.

25 Q Did you ask for any medical treatment?

1 A No. I was trying to get away.

2 Q How long were you handcuffed?

3 A Oh, probably less than 10 minutes.

4 Q As I recall, you were handcuffed, and you were placed
5 in the rear of the patrol vehicle, correct?

6 A Yes.

7 Q And you were asked if you needed some air, and the
8 window was rolled down, correct?

9 A Yep.

10 Q And within a matter of a few minutes you were removed
11 from the vehicle, --

12 A No.

13 Q -- you were uncuffed --

14 A No.

15 Q -- and you were given a citation.

16 A No. They wrote the -- they were having problems
17 writing the citation out and that. The officer's
18 vehicle I was sitting in, he put the windows up and
19 indicated that he was all nice and cool up in the
20 front, and I was like, I was hoping that was caught on
21 audio and that.

22 Q Who was that? What officer was that?

23 A I'm not really sure what officer that was, but he's
24 the one in Stubberd's case too. He screws up and
25 says, "You can see everything we can see, and we can

1 see everything you can see." And he was talking about
2 a recorder. It's really funny, the way that he said
3 it. But it was that guy. I can't think of his -- I
4 don't know his name.

5 Q When did he make this statement, "You can see whatever
6 we can see"?

7 A That was in that Stubberd's case or whatever, the one
8 where they broke out his window and stuff.

9 Q The autistic guy?

10 A Yes, yes.

11 Q And so, you've been given a citation, and you're
12 allowed to leave?

13 A Yes.

14 Q So, you're detained for less than 10 minutes?

15 A Yeah, but they stole my camera.

16 Q Who stole your camera?

17 A I believe Chief Settles took it.

18 Q Where did he take it?

19 A Into the police station.

20 Q Did you ever get it back?

21 A The next day. Well, when I went into the police
22 station and asked him -- told him I wanted my camera
23 back, he said that he was going to hold on to it. He
24 said he was going to check into getting a warrant to
25 see what's on it.

1 Q Does your video show the white car illegally parked?

2 A I believe you can see it when I walked by it.

3 Because, like I said, I got a video from starting down
4 at the far end of the building there and getting a
5 shot of the front door, then moving forward a little
6 bit and getting a shot of the sign and the sally port,
7 and then continuing on down the sidewalk. I believe
8 that car, that vehicle, is in the video when I'm
9 shooting from the far distance.

10 Q Well, that was probably a focal point of your video,
11 right? Because that was the whole reason you were
12 taking --

13 A Not this vehicle. Not this vehicle. The police
14 vehicle that was parked further down in the handi-
15 capped zone facing the wrong direction.

16 There's one or two handicapped
17 parking spots in front of the police station, and he
18 pulled in right there facing the wrong way on the
19 wrong side of the road, like this vehicle is, but in a
20 handicapped spot.

21 Q So, you only cared --

22 A That's why I wanted pictures of that. I wanted
23 pictures of that badly, but I couldn't get it.

24 Q Why did you want it so badly?

25 A Just so that I can say they can and we can't. I mean,

1 you know, the privileged, the privileged, you know,
2 that's why.

3 Q Because they're sovereign citizens?

4 A Yes. They're privileged. They find they've done
5 nothing wrong.

6 Q All right. But the fact that someone else's vehicle
7 was parked illegally wasn't of great interest to you?

8 A He's the common man. Let him. He can do what he
9 wants. You know, it's none of my business. But, you
10 know, what they're doing wrong is my business.

11 Q You don't want to mess with the common man?

12 A He's a free man. He can do what he wants.

13 Q Like you?

14 A I imagine, yes.

15 Q All right. And you've provided us with some photo-
16 graphs. I'm going to show you Exhibit No. 1 and ask
17 if you can tell me what's depicted in that photograph?

18 A Yep, that's my arm and the bruises.

19 Q What arm is it?

20 A It's my right arm.

21 Q And who took that photo?

22 A I took that photo.

23 Q What did you take the photo with?

24 A With my camera phone.

25 Q Your cellphone?

1 A Yes.

2 Q Who pays your cellphone bill?

3 A I do.

4 Q Do you still have a cellphone?

5 A Yes, I do.

6 Q Who's your carrier?

7 A Boost.

8 Q Boost Mobile?

9 A Yep.

10 Q How long have you had a cellphone?

11 A Oh, whew. Probably two months now, three months.

12 Q All right. But you had this in June of 2018. How
13 long had you had the phone then?

14 A It might've been my other phone, or it might've been
15 my tablet. It could've been this tablet here. I'm
16 not really sure.

17 Q How long --

18 A They're both Androids or whatever. Huh?

19 Q How long have you owned the tablet?

20 A This tablet? This one, probably about two years now,
21 and then the one prior to it, three or four years.

22 Q And what date was it that you took those photographs?
23 That photograph, I'm sorry.

24 A It was three days later, four days later. The 17th, I
25 believe.

1 Q Was anyone present when you took the photograph?

2 A Nope.

3 Q I'm going to show you what's been marked as Exhibit
4 No. 2. Can you tell me what's shown in that photo-
5 graph?

6 A Yep, another shot of my arm.

7 Q Same arm?

8 A Yep.

9 Q Same bruise?

10 A Yep.

11 Q What date did you take that picture?

12 A The same time.

13 Q Same date?

14 A Yep, same date.

15 Q Any other photographs that you took related to this
16 incident that you haven't produced?

17 A There might be several different shots of this, but --

18 Q So, why didn't you produce those?

19 A Because I just took as many as I could, and some of
20 them didn't come out right, you know, you couldn't
21 see.

22 Q These are your two best pictures?

23 A These are the ones somebody chose here, I guess, that
24 I had sent them.

25 Q Did you send your attorney more than two photographs?

1 A I cannot recall. I don't recall.

2 Q But you have more than two photographs?

3 A Yeah. I probably took eight to 10 of them, you know.
4 Because of the lighting and that, it's hard to -- it
5 was hard to see.

6 Q What did you do with those other photographs?

7 A They're still in the file.

8 MS. FORBUSH: All right. Let's take
9 a short break.

10 (Recess taken.)

11 MS. FORBUSH: All set?

12 THE WITNESS: Yes.

13 Q (Continuing): At any time during this encounter did
14 anybody tell you to stop filming?

15 A No.

16 Q You said that they stole your camera. Did you ever
17 get it back?

18 A Yeah. I got it back the next morning.

19 Q After you were given your citation what did you do?

20 A I went home.

21 Q Did you come back to the police department that day?

22 A Oh, yeah. I went back -- went home, got my other
23 camera -- well, at first -- all right. After they
24 released me from the vehicle I walked into the police
25 station, and I requested a complaint form.

1 And at that point I had talked --
2 Chief Settles had come out the door -- just opened the
3 door up and told me he was going to hold on to my
4 camera and check into getting a warrant to see what
5 was on it. And I told him, you know, "You're supposed
6 to just give it back to me." And he said he was going
7 to see if he can check into getting a warrant and
8 that.

9 So, then next day -- well, I went --
10 that happened, went back home, got a phone, video
11 recorded in the lobby there.

12 Q All right. Let me back up a little bit here.

13 You received your citation. You
14 went into the police department. You requested a
15 complaint form. Were you given a complaint form?

16 A I can't remember if I got complaint forms the first
17 time around or not.

18 But then I went home, because I
19 needed some way to document what was going on. So, I
20 went home and got another camera.

21 Q You got a cellphone?

22 A Yeah. I went home, got a cellphone or a tablet. I
23 don't remember exactly which one it was.

24 Q Did you tell your mom and stepdad what had happened?

25 A I don't know if I had told them exactly what had

1 happened yet.

2 Q Did you tell your wife what happened?

3 A Yeah. She knew something was up, just by the way I
4 came and left.

5 Q Did she drive you up to the police department?

6 A No, no.

7 Q She didn't come with you to the police department?

8 A No, no, no. It's only two-tenths of a mile.

9 Q All right. So, you went home, got either your
10 cellphone or your tablet, and you came back and went
11 into the lobby?

12 A Yeah.

13 Q So, what did you do in the lobby?

14 A I was video recording in the lobby.

15 Q Well, what were you recording? I don't understand.

16 A Well, the clock and stuff, so it's documented, the
17 times and stuff.

18 Q Okay. Did you talk to anybody while you were in the
19 lobby?

20 A Well, I talked to this officer here. He gave me
21 another copy of the ticket I had already received.

22 Q Did you ask for another copy?

23 A No, no. He just presented it to me.

24 Q All right. Did he say anything to you?

25 A That, "Here's your copy." And I said, "Well, I

1 already got a copy." And he wanted that one back, and
2 I had already put it in my pocket, so it's mine.

3 And he complained about me video-
4 taping in there.

5 Q Did he tell you to stop?

6 A No. He was behind the counter at the time, and then
7 he said, "Now he's videotaping in here." And he was
8 in his uniform at that time too.

9 Q Okay. Did anything happen while you were videoing,
10 other than the discussion you told me about?

11 A No, just waiting to get my camera back, and apparently
12 they decided they weren't going to give it back.

13 Q Who did you speak to about your camera at that point?

14 A Some of the officers in there, and they just acted
15 like they didn't know what I was talking about.

16 Q All right. So, then you returned the next day?

17 A I went to the courthouse the next day.

18 Q Which courthouse did you go to?

19 A Romulus Courthouse, and I wanted to speak with one of
20 the judges about getting my camera back.

21 Q Did you take your camera phone with you or your
22 tablet?

23 A No. At that time they don't allow them into the
24 common area of the courthouse anymore.

25 Q So, then what did you do?

1 A Well, I went into the courthouse, and I talked to
2 Judge Oakley. He told me he didn't work for me. He
3 doesn't work for the people.

4 Q Is that what he said?

5 A Yeah, that's what he said.

6 Q "I don't work for the common man"?

7 A He works for the state. He works for the state. And
8 I said, "Well, the state is the people," and he didn't
9 want to hear it. And he told me, I think, "Go see the
10 city manager" or whatever. So, I went and seen the
11 city manager. The city manager knew all, everything
12 that was going on. She said, "Your camera's at the
13 police station. You can go pick it up," so I went to
14 the police station and retrieved my camera.

15 Q What time was that?

16 A Oh, probably nine, nine o'clock in the morning, some-
17 where around in there.

18 Q Did you record your interaction with the city manager?

19 A No, I couldn't. They had my camera.

20 Q Well, you had your cellphone or your tablet with you
21 that you used --

22 A Right, right.

23 Q -- back in the lobby. Why didn't you record the city
24 manager?

25 A I just didn't. I was anxious to get my camera back

1 and --

2 Q All right. And you got your camera back?

3 A -- get the footage off of it.

4 Yes, I did.

5 Q And nobody erased your footage that you had?

6 A No. Somebody made a little one-second recording, like
7 they were messing with the camera. It was just a
8 brief, you know -- it clicked on and clicked off.
9 One, you know, very short clip, other than the other
10 videos prior to it, which were of the police station.

11 Like I said, I only had the camera
12 three or four days. There's not very much in front of
13 it. It's still intact, the same way it was. Since
14 then I've made recordings, but I have such big a card
15 on it that it can, you know, record.

16 Q All right. And you said that your tripod was damaged?

17 A Yes.

18 Q Did you get your tripod back?

19 A Yes.

20 Q What was the damage to it?

21 A It won't stay level now. You can't -- you know, on
22 the adjustment it's just like tilted a couple degrees,
23 and you can't get it to stay level, and it flops, you
24 know, it wiggles now. Before it was solid.

25 Q Do you still have the same tripod?

1 A I have the tripod, but I since use it for something
2 else now.

3 Q What do you use it for?

4 A A projector.

5 Q So, it works on your projector, but it doesn't work on
6 your camera?

7 A Well, the projector, when you're projecting onto the
8 wall or whatever, you can make adjustments and like
9 stick something under one of the legs or whatever to
10 straighten it out.

11 Q Are there any court orders against you for child
12 support?

13 A Nope.

14 Q Your spouse has never sought child support from you?

15 A Nope.

16 Q You were telling me about this. After you received
17 the settlement money from the Turner lawsuit --

18 A Uh-huh.

19 Q -- that you had fun with your money, and you went on a
20 cross-country trip --

21 A Yep.

22 Q -- to casinos.

23 A Well, I stopped at casinos along the way.

24 Q Tell me what states you visited.

25 A Oh, boy. Indiana, Illinois, Missouri, Oklahoma,

1 Texas, New Mexico, Arizona -- that's probably about
2 the trip across right there -- oh, Colorado,
3 California.

4 Q Any other states you stopped in?

5 A Ohio.

6 Q Did you stop to see your son on your cross-country
7 trip?

8 A I was going to, but my wife was in a mood, and I
9 didn't end up stopping.

10 Q She didn't want you to come over?

11 A She -- like I said, it's a deep story. She has
12 issues. She has, you know, I think psychological
13 issues, but she won't seek help for it.

14 Q All right. So, when you went to all these states --
15 Indiana, Illinois, Ohio, Missouri, Oklahoma, Texas,
16 New Mexico, Arizona, Colorado, California -- where did
17 you stay?

18 A I don't know. Hotels occasionally.

19 Q Well, if you didn't stay in a hotel where did you
20 stay? Did you stay with friends or --

21 A Car, car camping.

22 Q What car were you in?

23 A Well, I got the van and came back. I flew out there
24 -- no, I drove out there. I drove my mom out there.
25 I've done it so many times. She stays out there in

1 the winter.

2 Q Your mom?

3 A Yes.

4 Q In Arizona?

5 A Yes.

6 Q That's where she sells real estate?

7 A Yes.

8 Q Does she sell real estate here in Michigan?

9 A No. She used to.

10 Q So, when you say you did this cross-country trip and
11 you went car camping, what's car camping?

12 MR. RADNER: Objection. This is
13 completely irrelevant.

14 A It's when you sleep in the vehicle.

15 Q (By Ms. Forbush): So, you have this disability that
16 doesn't allow you to work, but you can -- you have a
17 bad back, a bad neck and a bad shoulder, but you can
18 sleep in a car, right?

19 MR. RADNER: Objection, asked and
20 answered.

21 Q (By Ms. Forbush): Right?

22 MR. RADNER: It's a mischaracter-
23 ization.

24 A I don't know. If you can get to sleep, yes.

25 Q (By Ms. Forbush): While you were taking this cross-

1 country trip did you go to the Grand Canyon?

2 A No.

3 Q Did you do any hiking?

4 A No.

5 Q Do any sightseeing?

6 A No.

7 Q Just went to casinos?

8 A A couple casinos, yeah.

9 Q Other than going to casinos, staying at a hotel once
10 in a while and car camping, what else did you do on
11 this cross-country trip?

12 MR. RADNER: Same objection.

13 A I went to Mexico.

14 Q (By Ms. Forbush): What did you do in Mexico?

15 A Just sightsee. You know, there's a little town right
16 there across the border.

17 Seen the dentist; that's about it.

18 Q Buy any drugs, --

19 A No.

20 Q -- anything like that?

21 A No. Videotaped a guy getting arrested.

22 Q For your footage?

23 A In Mexico. Boy, are they mean. You guys would really
24 enjoy it. (Laughing.)

25 Q You're laughing out loud? You thought it was funny?

1 A No. I said they would really enjoy it, what they can
2 get away with there.

3 Q Who are you referring to as "they"?

4 A The police officers.

5 Q Let me show you what I've had marked as Deposition
6 Exhibit No. 7, which are your Answers to Interroga-
7 tories.

8 A Uh-huh.

9 Q I want to focus your attention to page 12 of Exhibit
10 7. Is that your signature?

11 A Yes.

12 Q And I assume that when you signed that document you
13 were indicating that your answers were truthful and
14 accurate to the best of your knowledge and informa-
15 tion.

16 A Yes.

17 Q And you read the answers, and you thought they were
18 accurate, correct?

19 A Yes.

20 Q Since this incident and the return of your camera and
21 whatnot, have you had any other contact with the
22 Romulus Police Department that you haven't told me
23 about?

24 A Not that I can think of, no.

25 Q Did you ever file an official citizen complaint

1 related to this incident?

2 A No.

3 Q Why not?

4 A Because, like I said, they will find nothing was done
5 wrong. It's pointless.

6 Q Have you ever filed a citizen complaint against the
7 Romulus Police Department?

8 A Yes, Turner.

9 Q Have you filed citizen complaints against any other
10 departments?

11 A Westland.

12 Q When was that? Well, how many times?

13 A One, for the jaywalking ticket.

14 Q And what happened with that citizen complaint?

15 A They found me guilty, so there was no reason for them
16 to investigate any further.

17 Q Do you know of anyone who witnessed this incident at
18 the Romulus Police Department on June 14th, 2018,
19 other than police officers?

20 A There was a lady in a dayglow green shirt. She
21 happened to be videotaping it.

22 Q Who is "she"?

23 A I have no idea.

24 Q Where was she?

25 A She was in the police lot.

1 Q And she videotaped what?

2 A The interaction between Chief Settles and the other
3 officer and me.

4 Q How do you know she was videotaping?

5 A You can see her videoing.

6 Q Did she have a cellphone?

7 A Yes.

8 Q How far away from you was she?

9 A She was where the altercation started. You know, she
10 was in that position from where I had retreated, and
11 she was on the sidewalk.

12 Q What was she, a city employee, or who was she?

13 A I have no clue. Nobody will tell me who she is. I'm
14 sure they know who she is.

15 Q Is she black? Is she white?

16 A A black lady, yes.

17 Q How old was she?

18 A An older lady. Probably in her 60s.

19 Q Did she say anything?

20 A No. She never got close enough.

21 Q Have you ever seen her since then?

22 A No.

23 MS. FORBUSH: I don't have any other
24 questions.

25

EXAMINATION

BY MR. RADNER:

Q I have one question.

A Yes, sir.

Q This lady who was recording you, was she an officer?

A That, I would not know. She had a dayglow green shirt on, you know, the fluorescent, bright color. I don't know who she is.

Q Did you see her interacting with the other police officers?

A No. I seen her interacting with -- well, I thought -- I don't know. It was prior to me getting there, and all I seen was Chief Settles riding a bicycle away from her.

Q Did you notice if the police officers noticed her?

A Well, obviously they know who she is. She was in the lot. I mean, she was way in the lot of the police department.

Q So, she was in that restricted area?

A Yes, yes.

Q That's where she was recording from?

A No. See, what happened is, when the confrontation started happening, she was watching. And she walked over to a certain point in the parking lot, and then she was like waving somebody over like, "Come on, come

1 on, come on. Look, something's happening here. Come
2 on." And when we were on the outside, you know, on
3 the outside, when they got to the outside, then she
4 came around the corner; that's when she pulled out her
5 cellphone, I imagine it was, and started videotaping
6 it as we were, you know, walking down the sidewalk.
7 Her and that other lady that was in the striped shirt
8 were discussing something, and that's when she, you
9 know, pulled out her camera.

10 Q She was discussing something with someone with a
11 striped shirt?

12 A The black lady with the blue and gray striped shirt.
13 I think she's a detective there.

14 Q She also came from the restricted area?

15 A She was the one in the vehicle that was pulling in
16 that beeped at me.

17 Q Okay. So, this lady who was recording you spoke to
18 that lady who was pulling in that beeped at you?

19 A Right, right. The lady, she had collected the bike
20 from where Chief Settles kept it -- left it blocking
21 the gate and moved it over by the keypad thing, behind
22 the keypad, from what I can see in the video. And
23 then she was talking to the lady with the striped
24 shirt, and that's when she pulled out her phone and
25 started recording as she was walking up.

1 Q Did you try to get her information from the police
2 station?

3 A I had mentioned it when I went in, that I wanted to
4 know who the lady in the dayglow shirt was. You know,
5 she had a video I would like copies of, if I could
6 possibly get it. I don't know if she's a city
7 employee or not, so I don't know -- it's private. You
8 know, it's hers, it's hers.

9 Q Who did you ask at the police station?

10 A The records clerk.

11 Q Did you ask Chief Settles?

12 A No, I did not, no.

13 MR. RADNER: I don't have any other
14 questions.

15 MS. FORBUSH: No questions.

16 (Deposition concluded at 10:37 a.m.)

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STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

I, Susan L. Marek, CSR-2692, a Notary Public duly commissioned and qualified within and for the County of Wayne, State of Michigan, do hereby certify that I conducted the examination of the deponent, BILLY GENE NORRIS, II, in the foregoing deposition; that prior to the taking of said deposition the said deponent was duly sworn to tell the truth, the whole truth and nothing but the truth; that he was examined upon his oath; that his examination was reduced to typewritten form under my supervision; that the deposition is a full, true and correct transcript of my stenographic notes of the testimony of said deponent.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel, nor am I financially interested in this action.

I further certify that no request was made that the deposition be submitted to said deponent for examination and correction or that he sign the same.

IN WITNESS WHEREOF, I have hereunto
set my hand this 9th day of September, 2019.

Susan L. Marek, CSR-2692, Notary Public
Wayne County, State of Michigan
Acting in Oakland County
My commission expires: 10-23-25